

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**CELLULAR COMMUNICATIONS
EQUIPMENT LLC,**

Plaintiff,

V.

TCL CORPORATION,

**TCL COMMUNICATION
TECHNOLOGY HOLDINGS LIMITED,**

**HUIZHOU TCL MOBILE
COMMUNICATION CO. LTD.,**

TCT MOBILE INTERNATIONAL LTD,

AND

**TCL ELECTRONICS HOLDINGS
LIMITED,**

Defendants.

[illegible]

C.A. No. 2:20-cv-00080

JURY TRIAL DEMANDED

**JOINT AGREED MOTION TO EXTEND TIME TO ANSWER OR
OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF'S AMENDED
COMPLAINT AND WAIVER OF FOREIGN SERVICE REQUIREMENT**

Plaintiff Cellular Communications Equipment LLC (“CCE”) and Defendants TCL Corporation, TCL Communication Technology Holdings Limited, Huizhou TCL Mobile Communication Co. Ltd., TCT Mobile International Ltd., and TCL Electronics Holdings Limited (“Defendants”) respectfully move the Court to enter an order extending Defendants’ time to answer, move, or otherwise plead in response to CCE’s Amended Complaint through and including September 7, 2020.

CCE filed suit on March 17, 2020 against TCL Corporation and TCL Electronics Holdings Limited. CCE filed an Amended Complaint on April 10, 2020 adding Huizhou TCL Mobile Communication Co. Ltd., TCT Mobile International Ltd., and TCL Communication Technology Holdings Limited as Defendants. The Waivers of Summons were signed on April 26, 2020 and the parties agreed to an extension of time to answer until which extended the time to answer until September 7, 2020. CCE and Defendants agreed that Defendants, which are foreign corporations located outside the United States, waive the service of process requirements under Federal Rule of Civil Procedure 4(h) and 4(f)(1) and will not challenge service in exchange for the extension.

Accordingly, the parties jointly move for an extension of time for all five Defendants to answer, move or otherwise plead in response to the Amended Complaint through and including September 7, 2020. This extension is not sought for the purposes of delay but so that justice may be served.

Dated: June 11, 2020

Respectfully submitted,

<p><u>/s/ Jonathan H. Rastegar</u> Jeffrey R. Bragalone (lead attorney) Texas Bar No. 02855775 Jonathan H. Rastegar Texas Bar No. 24064043</p> <p>BRAGALONE CONROY PC 2200 Ross Avenue Suite 4500W Dallas, TX 75201 Tel: (214) 785-6670 Fax: (214) 785-6680 jbragalone@bcpc-law.com jrastegar@bcpc-law.com</p> <p>ATTORNEYS FOR PLAINTIFF CELLULAR COMMUNICATIONS EQUIPMENT LLC</p>	<p><u>Jeffery L. Johnson with permission</u> Jeffrey L. Johnson State Bar No. 24029638 ORRICK, HERRINGTON & SUTCLIFFE LLP 609 Main St., 40th Floor Houston, TX 77002 Telephone: (713)658-6450 Facsimile: (713)658-6401 jj@orrick.com</p> <p>ATTORNEY FOR DEFENDANTS</p>
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this the 11th day of June, 2020.

/s/ Jonathan H. Rastegar
Jonathan H. Rastegar